



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

CRAIG CARPENITO
UNITED STATES ATTORNEY

Alex Silagi
Assistant United States Attorney

970 Broad Street, Suite 700
Newark, NJ 07102
alex.silagi@usdoj.gov

main: (973) 645-2700
direct: (973) 297-2046

October 8, 2020

By ECF

The Honorable Esther Salas
United States District Court
for the District of New Jersey
Martin Luther King Jr. Fed'l Bldg & U.S. Cthse.
50 Walnut Street
Newark, NJ 07102

Re: *Fang, et al. v. Saldana, et al.*,
Civil Action No. 2:17-cv-02092-ES-JAD

Dear Judge Salas:

This office represents Defendants in this matter. We respectfully request permission pursuant to Local Civil Rule 7.2(b) to file an overlength reply brief in support of the Department of Education's ("DOE") motion to dismiss. More specifically, DOE requests a five-page extension over the 15-page limit. This extension is necessary due to the length of Plaintiffs' opposition brief and extensive arguments and citations to 61 cases, multiple statutes and regulations. The Plaintiffs' opposition brief further asserted new allegations that DOE contends were not included in the Second Amended Complaint. For the foregoing reasons, DOE respectfully submits that an extension of the length of the reply brief is necessary and requests permission from the Court to extend the page limit from 15 to 20 pages. I have conferred with Plaintiff's counsel, Ira Kurzban, Esq., and counsel does not oppose this request.

Thank you for the Court's consideration of this matter.

Respectfully submitted,

CRAIG CARPENITO
United States Attorney

By: *s/Alex Silagi*
ALEX SILAGI
Assistant United States Attorney

cc: Thomas Moseley, Esq. (By ECF)
Ira Kurzban, Esq. (By Email)
Elizabeth Montano, Esq. (By Email)
Edward Ramos, Esq. (By Email)

SO ORDERED.

/s/Esther Salas
Hon. Esther Salas, U.S.D.J
October 9, 2020